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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA
9

10 * * *

11 **Ryan Borchik,**

Case No.: 2:21-CV-00567-RFB-VCF

12 Plaintiff,

13 vs.

**Stipulation to Extend Discovery
Plan and Scheduling Order
Deadlines (Second Request)**

14 **State Farm Mutual Automobile**
15 **Insurance Company,** a foreign
16 corporation licensed to do business in
17 Nevada; Does I through X, inclusive and
18 Roe Business Entities I through X,
inclusive,

19 Defendants.

20 Pursuant to Fed R. Civ. P. 6, Fed. R. Civ. P. 26, LR IA 6-1, LR IA 6-2, LR 7-1, and LR
21 26-4, the parties, by and through their respective counsel of record, stipulate and
22 agree that there is good cause to extend the discovery deadlines:

23
24 **I. Introduction**

25 The parties have worked diligently to complete the needed discovery, including
26 disclosures and written discovery. Depositions of key witnesses have been delayed,
27 however, resulting in the need for an additional extension of the discovery deadlines,
28 as set forth below.



1 **II. Discovery Status**

2 a. **Discovery that has been Completed:**

- 3 1. Plaintiffs initial FRCP 26 disclosures
- 4 2. Defendant's initial FRCP 26 disclosures
- 5 3. Plaintiffs first supplemental FRCP 26 disclosure
- 6 4. Plaintiffs second supplemental FRCP 26 disclosure
- 7 5. Plaintiffs third supplemental FRCP 26 disclosure
- 8 6. Defendant's interrogatories to Plaintiff
- 9 7. Defendant's request for production to Plaintiff
- 10 8. Defendant's request for admissions to Plaintiff
- 11 9. Plaintiff's interrogatories to Defendant
- 12 10. Plaintiffs request for production to Defendant
- 13 11. Plaintiff's requests for admission to Defendant
- 14 12. Plaintiff fourth supplemental FRCP 26 disclosure
- 15 13. Defendant responded to Plaintiff's written discovery
- 16 14. Plaintiff responded to Defendant's written discovery

17 b. **Discovery that Remains**

- 18 a. Preparation of a stipulated protective order so that State Farm can
- 19 produce trade secret and/or confidential business information;
- 20 production of said documents
- 21 b. Deposition of Ryan Brent
- 22 c. Deposition of State Farm's 30(b)(6) witness
- 23 d. Deposition of Ryan Borchik
- 24 e. Expert disclosures
- 25 f. Deposition of experts, if needed
- 26 g. Additional written discovery as needed
- 27
- 28



III. Reason for the Requested Extension

The parties have completed the above-referenced discovery. The parties have also been coordinating a stipulated protective order so that State Farm can produce documents to Plaintiff that are confidential and/or trade secret. Both parties are coordinating the depositions of Ryan Brent and the FRCP (30)(b)(6) witness for State Farm but there have been scheduling issues, made more difficult by the holidays. The parties' retained experts will need these depositions for their reports. For these, the parties seek a 30 day extension to the discovery deadlines, as outlined below.

IV. Proposed Schedule

	CURRENT DEADLINE	PROPOSED DEADLINE
Motions to amend or add parties	October 29, 2021	October 29, 2021
Initial expert disclosures	January 14, 2022	February 14, 2022
Rebuttal expert disclosures	February 14, 2022	March 16, 2022
Close of Discovery	March 14, 2022	April 13, 2022
Dispositive motions	April 4, 2022	May 4, 2022
Pre-Trial Order	May 4, 2022	June 3, 2022

Dated this 13th day of December 2021.

H&P Law

/s/ Marjorie Hauf

Marjorie Hauf, Esq.
Nevada Bar No. 8111
Attorneys for Plaintiff

Dated this 13th day of December 2021.

Carman Cooney Forbush PLLC

/s/ Sean Cooney

Sean Cooney, Esq.
Nevada Bar No. 12945
Attorneys for Defendants

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

ORDER

It is so ordered.

December 14, 2021

Cam Ferenbach
United States Magistrate Judge